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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL MAGANA MARTINEZ

Defendants.

CASE NO. 5:23-MJ-00021-CDB

**STIPULATION RE TREATMENT OF
PROTECTED INFORMATION; [PROPOSED]
ORDER**

WHEREAS, the discovery in this case contains a large amount of personal identifying information, including personal identification numbers, dates of birth, financial account numbers, telephone numbers, and residential addresses (“Protected Information”); and

WHEREAS, the parties desire to avoid the necessity of large-scale redactions and the unauthorized disclosure of Protected Information to anyone not a party to this case;

The parties agree that entry of a stipulated protective order is appropriate.

THEREFORE, the parties stipulate as follows:

1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure and its general supervisory authority that pertains to all discovery produced to the defendant’s counsel in this case;

2. By signing this stipulation, defense counsel agrees not to share any discovery that contains Protected Information with anyone other than defense counsel and defense counsel’s

1 investigators and support staff. Defense counsel may permit the defendant to view unredacted discovery
2 that contains Protected Information in the presence of defense counsel and defense counsel's
3 investigators and support staff. But defense counsel shall not allow the defendant to copy the Protected
4 Information and may only provide the defendant with copies of discovery from which the Protected
5 Information has been redacted;

6 3. The discovery may be used only in connection with the litigation of this case. The
7 discovery is now and will remain the property of the government. Defense counsel will return the
8 discovery to the government, or certify that it has been destroyed, at the conclusion of the case;

9 4. Defense counsel will store the discovery in a secure place and will use reasonable care to
10 ensure that it is not disclosed to third persons in violation of this agreement; and

11 5. In the event that the defendant substitutes counsel, undersigned defense counsel agrees to
12 withhold discovery from the new counsel until substituted counsel agrees to be bound by this stipulation
13 and resulting order.

14 IT IS SO STIPULATED.

15
16 DATED: June 21, 2023

/s/ Alekxia Torres-Stallings
Alekxia Torres-Stallings
Counsel for Miguel Martinez

18
19 DATED: June 21, 2023

/s/ Joseph Barton
Joseph Barton
Assistant United States Attorney

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[PROPOSED] ORDER

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For good cause shown, the stipulation between counsel, dated June 21, 2023, in *United States v. Miguel Martinez*, 5:23-MJ-00021-CDB, regarding the treatment of protected information contained in the discovery, is approved.

IT IS SO ORDERED.

Dated: **June 21, 2023**


UNITED STATES MAGISTRATE JUDGE